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**FEDERAL ON-SCENE COORDINATOR'S  
AFTER ACTION REPORT  
for  
CHEM-FAB, INC.  
DOYLESTOWN, BUCKS COUNTY, PA**

INFORMATION IN THIS  
REPORT USED TO SUPPORT  
NFRAP/ARCHIVE OF THE  
FORMER CARTEX SITE



**UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
PHILADELPHIA, PENNSYLVANIA**

**Federal On-Scene Coordinator's After Action Report  
Chem-Fab, Inc.**

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**SITE:** Chem-Fab, Inc.

**SIZE:** Approximately one acre

**LOCATION:** 300 N. Broad Street, Doylestown, Bucks County, Pennsylvania, 18901

**APPROVAL DATE:** 28 March 1994

**PROJECT DATES:** 2 September 1994 - 24 October 1995

**DESCRIPTION:** The Chem-Fab, Inc. Site is a one-acre property with three buildings located in a commercial area on N. Broad Street in Doylestown, Bucks County, Pennsylvania. The owner of the Site property is Chem Fab, Inc.; at this time the owner of Chem Fab, Inc. has not been traced. (However, Manfred DeRewel did initially hire Republic Environmental to handle drum removal/disposal.) Illegal dumping reports at the Site date back to 1973; as recent as June 1994, reports indicated the presence of abandoned drums and containers. In September of 1994, OSC George English conducted a Removal Assessment in conjunction with a Criminal Investigation. On 24 March 1995, funds were initiated for the EPA to stabilize the Site. Various tanks, drums, and containers of hazardous substances and wastes that were stored throughout the Site property were properly disposed.

**HAZARDOUS MATERIALS:** Inorganic acidic liquids and solids, caustic liquids and solids, poisonous solids, liquids, and gases, flammable liquids, radioactive material, polychlorinated biphenyls.

**QUANTITIES REMOVED:** 117 drums, approximately 8400 gallons of pumped liquid waste, approximately 250 gallons of fuel oil, 6 cubic yard boxes of solid waste, 3 cylinders.

**OSCs:** George English, Jack Owens

**REMOVAL CONTRACTOR:** Environmental Technologies, Inc., Earth Technology Remediation Services Richmond, Virginia

Evergreen Environmental Group  
33 Industry Drive  
Bedford, Ohio 44146  
(216) 786-7800

Laidlaw Pinewood Facility  
Rt. 1, Box 255  
Pinewood, South Carolina 29125  
(803) 452-5003

North East Chemical Corporation  
3301 Monroe Avenue  
Cleveland, Ohio 44113  
(800) 843-6322

Radiac Research Corporation  
Barnwell Waste Management Facility  
operated by: Chem-Nuclear Systems, Inc.  
P.O. Box 726  
Barnwell, South Carolina 29812  
(803) 259-1781

Republic Environmental Systems (PA), Inc.  
2869 Sandstone Drive  
Hatfield, PA 19440  
(215) 822-2676

Research Oil Company  
2777 Broadway Avenue  
Cleveland, OH 44115  
(216) 623-8383

Trade Waste  
7 Mobile Avenue  
Sauget, Illinois 62201  
(618) 271-2804

C.R. Warner, Inc.  
Yankee Point Terminal  
61st & West Passyunk Avenue  
Philadelphia, PA 19153  
(215) 726-5711

Waste Technology Industries (WTI)  
1250 St. George Street  
East Liverpool, OH 43920  
(800) 403-4890

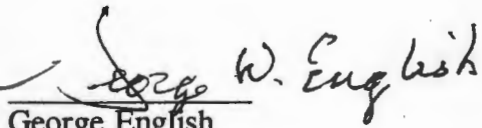
**Chem-Fab, Inc.**  
**Federal On-Scene Coordinator's After Action Report**

**FOREWORD**

The On-Scene Coordinator (OSC), as mandated by the National Oil and Hazardous Substances Pollution Contingency Plan, 40 CFR Part 300 (NCP 1994), is required to provide a coordinated federal response capability at the scene of an unplanned or sudden discharge of oil or hazardous substance that poses a threat to the public health or the environment. In addition, the provisions of Section 104 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 1980, as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), promote a coordinated federal, state and local response to mitigate situations at hazardous waste sites that pose an imminent and substantial threat to public health and/or the environment.

The Chem-Fab, Inc. Site represented an imminent and substantial risk of harm to human health and the environment due to the uncontrolled release of a hazardous substance to the environment, thereby providing a legal basis for federal response activities. The provisions of the NCP, Section 300.415, were implemented by the U.S. Environmental Protection Agency, Region III, Philadelphia, Pennsylvania.

The OSC would like to extend thanks to all of the agencies and individuals who provided valuable assistance and expertise to ensure the successful completion of this cleanup effort.

  
George English  
On-Scene Coordinator  
U.S. EPA Region III  
Philadelphia, Pennsylvania



## **I. INTRODUCTION**

### **A. Initial Situation**

EPA received an Incident Notification Report in June of 1994 from an anonymous caller abandoned drums and containers were being stored at 300 N. Broad Street in Doylestown, Bucks County, Pennsylvania. Bucks County Department of Health records indicated a history of illegal dumping at this property, dating back to 1973. The Pennsylvania Department of Environmental Resources (PADER) provided previous Site assessment information, including soil data, indicating elevated levels of hexavalent chromium. OSC English responded to the Incident Report and met with members of The Bucks County Emergency Management Agency, Bucks County Department of Health, and the Doylestown Assistant Fire Marshall on 1 and 2 September 1994, to discuss Site history and potential future actions. Site response was delayed due to problems identifying a PRP to gain access. On 13 September 1995, OSC English accessed the Site to search for evidence of storage and/or disposal of hazardous substances. Site access for EPA was initiated through a ten-day search warrant, in conjunction with agents from Criminal Investigation Division (CID), NEIC, U.S. Federal Bureau of Investigations (FBI), and U.S. Drug Enforcement Agency (DEA). Based on the results of EPA's investigation, and analytical results of EPA-NEIC drum and tank sampling efforts, CERCLA funds were allocated to address the existent threats to human health and the environment.

### **B. Site Location**

Chem-Fab, Inc. is located at 300 N. Broad Street in Doylestown, Bucks County, Pennsylvania. The one-acre parcel of land contains three separate buildings, where various business ventures have operated. The Site is bordered to the East by an operating business, and to the West and South by an active storage facility. The north face of the property is bordered by N. Broad Street. Directly across the street from Chem-Fab, Inc. is an operating newspaper agency.

### **C. Efforts to Obtain Cleanup from Potentially Responsible Parties**

Due to the fact that EPA's Criminal Investigation Department, EPA-NEOC, FBI, and DEA were conducting joint investigations at the Chem-Fab, Inc. Site, information pertaining to potentially responsible parties was considered sensitive. The owner of the Site property is Chem Fab, Inc.; the owner of this corporation has not been determined, but it is believed that Manfred DeRewel, Sr. (owner/operator of Boarhead Farms NPL Superfund Site and Revere Chemical Superfund Site) and his son, Fred DeRewel, Jr., are associated with the property and business operations on Site.

AGENCY	CONTACT	BRIEF DESCRIPTION OF DUTIES
STATE AGENCIES		
Pennsylvania Department of Environmental Resources (PADER) (now PADEP) PO BOX 2063 Harrisburg, PA 17105 (717) 772-3314		Assisted OSC with State ARARs and emergency coordination.
COUNTY AGENCIES		
Bucks County Department of Health 50 North Main Street Doylestown, PA 18901 (215) 345-3318	Peter Knoll, (title)	Provided background information and assisted OSC with emergency coordination.
Bucks County Emergency Management Agency 50 North Main Street Doylestown, PA 18901 (215) 348-7518	John Dougherty, EMA Coordinator	Provided background information and assisted OSC with emergency coordination.
Doylestown Borough Police 57 West Court St. Doylestown, PA 18901 (215) 345-4143		Provided background information and provided periodic drive-by security checks.



ORM	Other Regulated Material
OSC	EPA On-scene Coordinator
PADER	Pennsylvania Department of Environmental Resources
PADEP	Pennsylvania Department of Environmental Protection
PPE	Personal Protective Equipment
PPB	Parts Per Billion
PPM	Parts Per Million
PRP	Potentially Responsible Party
RCRA	Resource Conservation and Recovery Act
RM	ERCS Response Manager
RP	Responsible Party
SARA	Superfund Amendment and Reauthorization Act
TAT	Roy F. Weston, Inc., Technical Assistance Team
TCLP	Toxic Characteristics Leachate Procedure
uR/hr	Micro-Roentgen per hour
VOA	Volatile Organics Analysis

### III. NARRATIVE OF EVENTS

Based on an anonymous report that drums and miscellaneous containers were stored at the vacated Chem-Fab facility at 300 North Broad Street in Doylestown, Bucks County, Pennsylvania, an ERNS Incident Notification Report was filed on 27 June 1994.

Initial research of potential Site PRP's indicated that Manfred DeRewel, Sr. was associated with the site, and due to his association with other Superfund sites, as well as various alleged criminal activities, CID, FBI, and DEA were consulted.

OSC English and Roy F. Weston Technical Assistance Team (TAT) members met with Bucks County Health Department officials and Bucks County Hazardous Materials representatives on 1 and 2 September 1994 to gather background information on the Chem-Fab Site. Health Department records indicated reports of illegal dumping at the site dating back to 1973. Information was shared that PADER had collected soil samples on site that showed elevated levels of hexavalent chromium. Difficulty with identifying and contacting the PRP delayed access to the site.

Another meeting was held on 12 September 1994, attended by OSC English, TAT members, FBI, EPA-NEIC, and CID representatives and the Doylestown Police, to discuss an upcoming Federal Investigation of the Chem-Fab Site. A warrant was prepared to facilitate a Federal site inspection be conducted by EPA, CID, FBI, DEA and NEIC officials. On 13 September 1994, the warrant was served at the Chem-Fab Site, and EPA, TAT, NEIC, CID, DEA, and FBI began the inspection. NEIC inventoried and sampled drums, and photodocumented Site conditions. The site inspection continued on the 14th and 15th of September 1995. Excavation operations uncovered a buried tank that appeared to be leaking, approximately 50 feet in length, and approximately half full of a yellowish liquid. Also, several areas of cement floor were removed during the location of drains and/or ports, possibly used for disposal of chemicals.

On 1 October 1994, OSC English tasked TAT members to observe CID operations and to



buried tank was postponed, due to a reported problem that the disposal company had with treatment of disposal samples. On Thursday, 15 June 1995, approximately 8,400 gallons of liquid waste (D007, D002) was pumped from the buried tank, and transported off site for disposal at the Research Oil Co. in Cleveland, Ohio. Site personnel demobilized following disposal operations.

On 29 August 1995, OCS, TAT, and ERCS personnel mobilized to the site to conduct transportation and disposal of remaining wastes on Site. Due to discrepancies with analytical results from drum disposal samples, the bid-winning disposal company refused to accept a portion of the drummed wastes. An additional company was solicited by ERCS to dispose of these drums. Disposal of 117 drums, 250 gallons of fuel oil, 6 cubic yard boxes of solid waste, and one cylinder was conducted between 29 August and 1 September 1995.

#### IV. RESOURCES COMMITTED

##### A. Initial Funding Request

The Regional Administrator approved funding for the Site on 28 March 1994, with a ceiling of \$607,120.

##### B. Additional Funding Request

No request for a ceiling increase was necessary.

##### C. Estimated Total Cost Summary

###### 1. Extramural

ERCS (ETI dba ETRS)	\$ 275,861
TAT	<u>\$ 49,890</u>
Extramural Subtotal	\$ 325,751

###### 2. Intramural

EPA (Direct)	\$ 3,778
EPA (Indirect)	<u>\$ 7,744</u>
Intramural Subtotal	<u>\$ 11,522</u>

**ESTIMATED TOTAL PROJECT COSTS \$337,273**

**PERCENT OF PROJECT CEILING EXPENDED = 55.6%**

## **B. Analytical Synopsis**

Sampling of all drums, tanks, and small containers was conducted for disposal parameters. Soil samples were collected at intermediate depths surrounding the buried tank, and analyzed for volatile organics, total metals, base-neutral extractables, and hexavalent chromium. Soil/water samples were collected from excavated sumps/ports inside the Chem-Fab warehouse building, and analyzed for total oil/grease. Detailed analytical reports of the contaminants identified can be referenced in the Chem-Fab Site file, stored at the EPA Region III Central File Room, Philadelphia, Pennsylvania.

## **C. Disposal Methods and Quantities Removed**

Table 1 provides detailed manifest information of materials that were disposed of from the Chem Fab, Inc. Site. Actual manifests can be referenced in the Site file, stored at EPA Region III Central File Room, Philadelphia, Pennsylvania.

STATE DOCUMENT NUMBER	DATE SHIPPED	ESTIMATED QUANTITY	MATERIAL	DISPOSAL FACILITY	DISPOSAL METHOD
PAE4257595* NJA2005421	08/29/96	1 drum	RQ Waste Corrosive Liquid, Basic, Inorganic, N.O.S., 8, UN3266, PG III, D002 (Sodium Hydroxide, Arsenic).	E.I. DuPont DeNemours & Co. Deepwater, New Jersey	Treatment
NJA2005353		1 drum	RQ Waste Corrosive Liquid, Acidic, Inorganic, N.O.S., 8, UN3264, PG III, D002 (Cadmium, Chromium).	E.I. DuPont DeNemours & Co. Deepwater, New Jersey	Treatment
NJA2205409		9 drums	RQ Hazardous Waste, Liquid, N.O.S., 9, NA3082, PG III, D004 (Arsenic, Lead).	E.I. DuPont DeNemours & Co. Deepwater, New Jersey	Treatment
NJA2005421		3 drums	RQ Waste Corrosive Liquid, Basic, Inorganic, N.O.S., 8 UN3266, PG III, D002 (Sodium Hydroxide, Potassium Hydroxide).	E.I. DuPont DeNemours & Co. Deepwater, New Jersey	Treatment
PAE4257864* PAE4259275	08/29/95	6 cubic yard boxes	RQ Hazardous Waste Solid, N.O.S., 9, NA3077, PG III, D004 (Arsenic, Benzene).	Waste Technology Industries East Liverpool, Ohio	Incineration
MDC0553644** L6441914	09/01/95	1 drum	RQ Waste Potassium Cyanide, 6.1, UN1680, PG I.4	Trade Waste Sauget, Illinois	Incineration
MDC0551453** AR753392 AR753392 AR753380 & AR623252	08/31/95	22 drums 17 drums 18 drums	RQ Waste Flammable Liquids, Corrosive, N.O.S., 3, UN2924, PG III (Xylene, Hydrochloric Acid). RQ Waste Flammable Liquids, Corrosive, N.O.S., 3, UN2924, PG III (Benzene, Hydrochloric Acid). RQ Waste Corrosive Liquid, N.O.S. >, 8, UN1760, PG III (Nitric Acid).	ENSCO Eldorado, Arkansas ENSCO Eldorado, Arkansas ENSCO Eldorado, Arkansas	Incineration Incineration Incineration
CTF0360701	08/31/95	1 drum	Waste Hydrogen Peroxide, Aqueous Solutions, 5.1, UN2014, PG II.	Clean Harbors of Connecticut, Inc. Bristol, Connecticut	Wastewater Treatment



## I. CHRONOLOGY OF EVENTS

THURSDAY, SEPTEMBER 01, 1994

OSC English met with Bucks County officials to discuss Chem-Fab, Inc. Site history.

FRIDAY, SEPTEMBER 02, 1994

OSC and TAT personnel met with Bucks County Health Department, Assistant Fire Marshall, and Bucks County Haz-mat officials and discussed the Chem-Fab, Inc. Site.

MONDAY, SEPTEMBER 12, 1994

OSC, CID, and TAT met at Willow Grove Residence Inn to discuss Chem-Fab, Inc. Site plans. A warrant was sealed for EPA/CID to conduct a joint inspection of Chem-Fab, Inc. property, and to conduct a search for storage of hazardous substances and/or wastes.

TUESDAY, SEPTEMBER 13, 1994

OSC, TAT, EPA-NEIC, CID, and FBI were on site at Chem-Fab, Inc. EPA-NEIC began sample collection from drums stored on site.

WEDNESDAY, SEPTEMBER 14, 1994

OSC, TAT, EPA-NEIC, CID, and DEA were on site to continue execution of warrant. EPA-NEIC continued drum sampling operations. Excavation on site uncovered a buried 50-foot tank approximately half-full of an unknown liquid.

THURSDAY, SEPTEMBER 14, 1994

OSC, TAT, EPA-NEIC, CID, and DEA were on site to continue execution of warrant. EPA-NEIC completed drum sampling operations. Contractors jackhammered areas of concrete floor surrounding ports and sumps inside the warehouse building.

WEDNESDAY, FEBRUARY 08, 1995

An Action Memo/Funding Request was submitted to the Regional Administrator for approval.

WEEK OF MARCH 26, 1995

Through a telephone conversation with OSC English, Manfred DeRewel, Sr. granted EPA access to the Chem-Fab, Inc. Site, and stated that his son, Manfred DeRewel, Jr., would be on site to unlock the gates and doors on April 3, 1995.



security operations.

WEDNESDAY, MAY 17, 1995

Drum sampling, haz-catting, and overpacking operations continued. On-site fuel tanks were inventoried for product and/or sludges. ERCS began removing drums from the two over-the-road (OTR) trailers on site. Heavy rains hindered Site operations this date.

THURSDAY, MAY 18, 1995

ERCS began clearing miscellaneous debris from the warehouse. Haz-catting of drum samples was completed, and ERCS began identifying/inventorying small containers from designated pallets. TAT personnel received the EPA Generator ID #PAD002323848 from EPA Lois Lauria. A rental office trailer was delivered to site.

FRIDAY, MAY 19, 1995

Clearing of warehouse debris, drum overpacking, and small container inventory operations continued. Two heavy duty electric service lines were discovered to originate in the Chem-Fab warehouse, and lead to other buildings site. The OSC informed CID Rick Shapiro, who traveled to site and inspected the suspect wiring. As directed by Shapiro, TAT photodocumented the suspect electrical wiring.

SATURDAY, MAY 20, 1995

Analytical results from samples of the buried tank contents were received. ERCS worked on re-staging overpacked drums.

SUNDAY, MAY 21, 1995

CID special agents Shumaker and Shapiro were on site to discuss operations. Empty containers were removed from the attic of the computer building on site, and two containers of solids were discovered. ERCS crushed empty glass containers removed from the attic.

MONDAY, MAY 22, 1995

Level B bulking operations began. During bulking, drum #FFF, which was known to contain both organic liquids and isocyanate foam part A, showed signs of an exothermic reaction. The contents of this drum eventually formed solids. Two other drums containing similar materials were vented as a precautionary measure. During operations, a 30-gallon drum containing acids fell off a forklift and leaked. The drum was immediately uprighted, and the spill was cleaned.

TUESDAY, MAY 23, 1995

During continued bulking operations, one drum began fuming violently, off-gassing a red-brown vapor. TAT air monitoring efforts showed that the red-brown vapors were acidic and extremely oxidizing.

## Federal On-Scene Coordinator's Report

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transport and disposal of tank waste would not occur as scheduled due to treatment problems with elevated levels of chromium in the disposal samples. Two technicians were sent home due to the last-minute disposal cancellation, and the OSC informed ERCS that their hours for today would not be billable to the project. The OSC and TAT met to discuss future removal and disposal plans for the site.

THURSDAY, JUNE 15, 1995

Frank's Vacuum Service trucks pumped out the contents of the buried tank, and hauled the liquid chromic acid waste for Research Oil. Two trucks transported waste off site, one containing approximately 4,900 gallons, the second containing approximately 3,500 gallons. All pumpable product was removed from the buried tank. The computer building was inaccessible, because the ERCS' key no longer operated the doorknob lock.

TUESDAY, AUGUST 29, 1995

Republic Environmental (solicited by ERCS) was on site to conduct transportation and disposal of 52 drums (Manifest #'s: PAE 4257584, PAE 4257621, PAE 4257610, & PAE 4257595). In addition, Republic transported 6yd<sup>3</sup> boxes of debris off site for disposal (Manifest #: PAE 4257864). Clean Harbors was on site to sample the remainder of the drums, which Republic Environmental had declined to handle, reportedly due to discrepancies with disposal sample analytical results. Radiac, Inc., solidified the radioactive waste on site using cement, and transported the one drum off site for disposal.

WEDNESDAY, AUGUST 30, 1995

C.R. Warner, Inc. was on site to pump out 250 gallons of fuel oil from site tanks and to transport it off site for disposal. TAT reviewed soil sample analytical results and due to trace amounts of contaminants present, suggested that further sampling occur at depths that would be more representative of soil potentially affected by the buried tank leakage. Clean Harbors was on site to transport five drums and one cylinder off site for disposal. (Manifest #'s: MAH 728800, MDC 0551456)

THURSDAY, AUGUST 31, 1995

ERCS vented a bulging drum of hydrogen peroxide, which was then transported off site for disposal by Clean Harbors (Manifest #: CTF 0360701). Clean Harbors also transported an additional 57 drums off site for disposal (Manifest #: MDC 0553644).

FRIDAY, SEPTEMBER 01, 1995

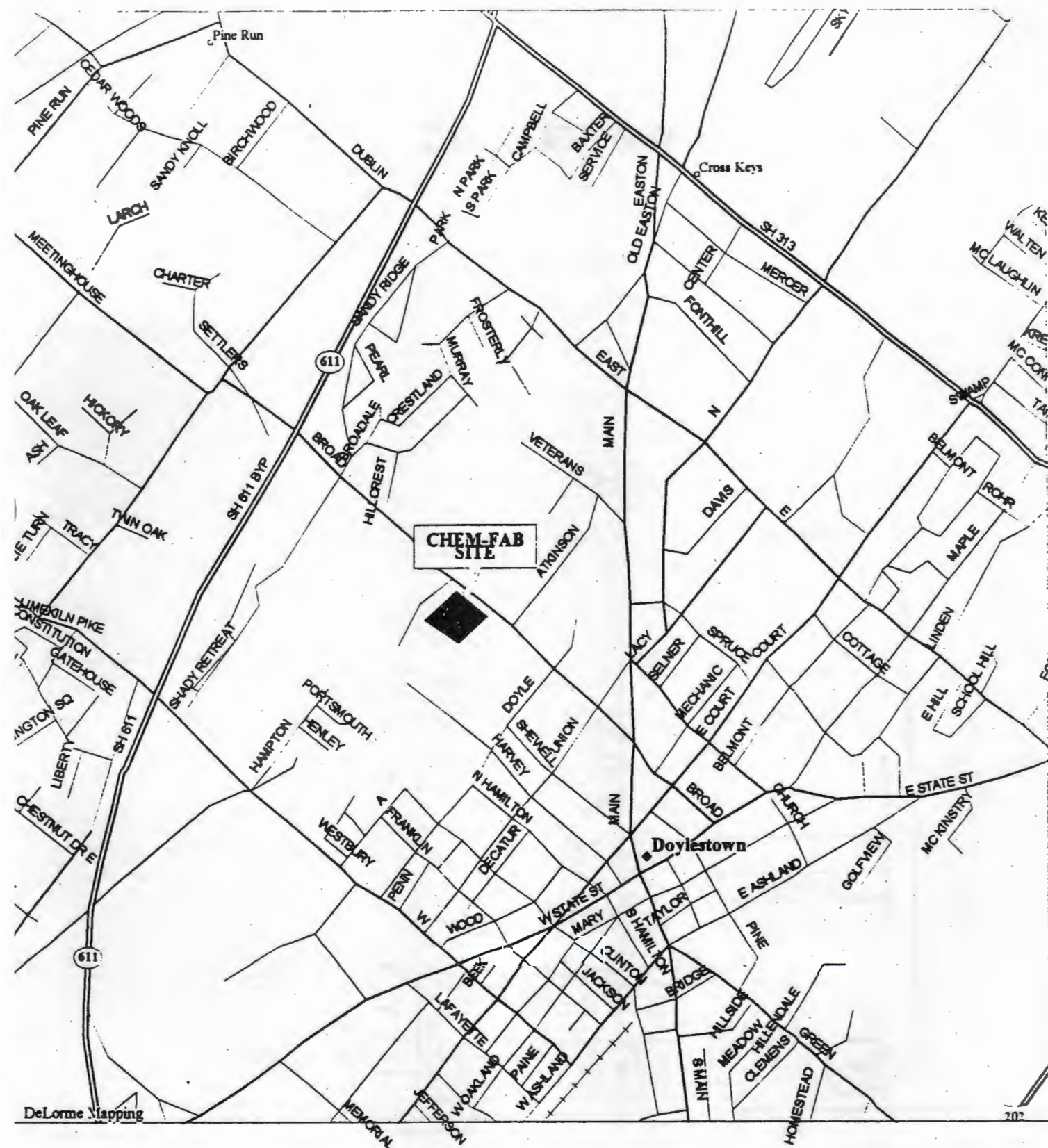
Clean Harbors transported the last remaining drum off site for disposal (Manifest #: MDC 0553644).

TUESDAY, OCTOBER 24, 1995

Tanner Industries, Inc., Philadelphia, was on site to transport and dispose of two cylinders of anhydrous ammonia (no manifest).

**APPENDICES**





D  
 State Route  
 Town, Small City  
 Population Center  
 Street, Road  
 Hwy Ramp  
 Major Street/Road  
 State Route

— River

Scale 1:15,625 (at center)  
 1000 Feet  
 500 Meters

CHEM-FAB SITE LOCATION  
 Mag 15.00  
 Tue May 14 08:56:52 1996



**3. Funding Documents**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107-4431

MAR 23 1995

SUBJECT: Approval of a Request for Funds for a Removal Action  
Chem Fab Corporation Drum Site  
Doylestown, Bucks County, Pennsylvania

FROM: Thomas C. Voltaggio, Director  
Hazardous Waste Management Division (3HW001)

TO: Elliott P. Laws, Assistant Administrator  
Office of Solid Waste and Emergency Response (5101)

THRU: Stephen Luftig, Acting Director  
Office of Emergency and Remedial Response (5201)

ATTN: John Riley, Acting Director  
Emergency Response Division (5202)

ISSUE

The attached CERCLA Request for Funds for a Removal Action pertains to the Chem Fab Corporation Drum Site, a defunct business located in a commercial area in Doylestown, Bucks County, Pennsylvania. A removal assessment was conducted on September 13, 1994. During investigation EPA Region III, National Enforcement Investigations Center (NEIC), and others found the presence of improperly and incompatibly stored drums of hazardous substances. These substances included but were not limited to flammable liquids such as methyl isobutyl ketone and acids, including hydrochloric acid. Some drums bore labels, indicating that they were waste acids dating back to the mid 1980's. Some drums were staged inside a building while others were outside and fully exposed to the elements. Additionally, a 50-foot underground storage tank of questionable integrity, was uncovered and found to contain an unknown substance that appeared to be leaking.

Because conditions at the Chem Fab Corporation Drum Site, meet removal criteria set forth in the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 CFR, Section 300.415, and pursuant to Delegation of Authority 14-1-A, the Hazardous Waste Management Division Director has authority to approve CERCLA Removal actions with a total cost of less than \$2 million and completion within 12 months. US EPA Region III has approved the release of \$607,120 of which approximately \$580,800 are Extramural costs, to mitigate the threat to public health, welfare, and the environment.

Attachment: Request for Funds



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107-4431

MAR 28 1995

SUBJECT: Request for Funds for a Removal Action  
Chem Fab Corporation Drum Site  
Doylestown, Bucks County, Pennsylvania

FROM: George English, On-Scene Coordinator *George W. English*  
Eastern Response Section (3HW31)

TO: Thomas C. Voltaggio, Director  
Hazardous Waste Management Division (3HW00)

THRU: Abraham Ferdas, Associate Division Director for  
Superfund Programs (3HW02) *Abraham Ferdas*

I. PURPOSE

A removal assessment was performed at the Chem Fab Corporation Drum Site (Site) in Doylestown, Bucks County, Pennsylvania, on 09/13/94 in accordance with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 CFR Part 300, by the On-Scene Coordinator (OSC). The OSC has determined that the Site poses an imminent and substantial threat to public health, welfare, and the environment, due to the presence of uncontrolled hazardous substances in drums and containers. The OSC has determined that the Site meets the criteria for initiating a Removal Action under Section 300.415 of the NCP. Funds are required to begin Removal Actions pursuant to Section 104 of CERCLA as amended by 42 USC § 9604. The actions necessary to abate the threats at this site are anticipated to require less than 12 months and \$2 million for completion.

II. SITE CONDITIONS AND BACKGROUND

A. Site Description

The Site is a fenced three-acre property with three buildings located in a commercial area on N. Broad Street in Doylestown, Bucks County, PA. Two creeks, Pine Run and Cook Run, are within an approximate two-mile radius of the site. Drums were found outside on the eastern side of the property, inside of the Chem Fab building, and inside the Electronic Marketing Group (EMG) building.



It is suspected that hazardous substances stored on Site may be waste materials traditionally associated with wastes from other DeRewal-owned Superfund sites.

#### D. National Priorities

This site has not yet been reviewed for placement on the National Priorities List (NPL). The OSC will forward information obtained from the removal action to the site assessment section.

#### E. State and Local Authorities' Roles

PADER, Bucks County Emergency Services, and Doylestown Police and Fire Department have provided the OSC with background information concerning the Site. The OSC continues to coordinate Site activities with State and local officials.

### III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT

Section 300.415 of the NCP lists the factors to be considered in determining the appropriateness of a Removal Action. Paragraphs (b)(2) i, ii, iii, iv, v, vi, and vii of Section 300.415 directly apply as follows to the conditions at the Chem Fab Corporation, Site.

- A. 300.415 (b)(2)(i) "Actual or potential exposure to nearby human populations, animals or the food chain from hazardous substances or pollutants or contaminants."

The Chem Fab Corporation Drum Site is situated in a moderately-developed commercial/residential area on N. Broad Street in Doylestown, Bucks County, PA, where the threat of the possible release of hazardous substances into the environment may occur. The drums on the eastern side of the property are in continued exposure to the elements, which has accelerated their deterioration. Some of the hazardous substances found onsite consist of, but are not limited to, solvents (methyl isobutyl ketone), and acids (hydrochloric acid). Both methyl isobutyl ketone and hydrochloric acid are listed as CERCLA hazardous substances according to 40 CFR Part 302, Table 302.4. The potential exists for a catastrophic release or fire, resulting in the uncontrolled release of hazardous substances into the environment.



- D. 300.415(b)(2)(iv) "High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate."

During excavation activities, an underground storage tank containing an unknown substance was uncovered. Since the condition of this tank is not known, a potential for the contents inside the tank to escape and impact the surrounding soils exists. Additionally, PADER soil analyses indicated high concentrations of hexavalent chromium. Chromium is listed as a CERCLA hazardous substance according to 40 CFR part 302, Table 302.4.

- E. 300.415(b)(2)(v) "Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;"

Drums are stored outside the facility in an unprotected area on the eastern side of the property. As the drums may corrode due to constant weathering and leak their contents on the ground, the potential of a release of hazardous substances exists.

- F. 300.415(b)(2)(vi) "Threat of fire and explosion;"

Drums of incompatible materials were found stored together inside and outside of the buildings. In the event of a fire, the reaction caused by these incompatible substances (flammables and acids) may cause an emergency threat to human health and the environment.

- G. 300.415(b)(2)(vii) "Availability of other appropriate federal or state response mechanisms to respond to the release."

PADER and local officials have requested the assistance of the U.S. EPA to mitigate the threats posed by this site.

#### IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances, pollutants, and contaminants from this Site, if not addressed by implementation of the response actions listed in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare, and to the environment.

### Intramural Costs

EPA Direct Costs	\$ 8,400
EPA Indirect Costs	<u>17,920</u>
Total Intramural	\$ 26,320
TOTAL PROJECT CEILING	\$ 607,120

### C. Contribution to Remedial Performance

The Chem Fab Corporation Site is a not on the NPL, so there are currently no plans for long-term Remedial Action. The proposed Removal Action is consistent with accepted removal practices and is expected to abate the threats that meet the NCP removal criteria. The proposed action is not anticipated to impede future responses at this Site.

### D. Compliance with ARARs

The proposed Removal Action will comply with all applicable, relevant, and appropriate environmental and health requirements (ARARs), to the extent practicable considering the exigencies of the situation. OSC has requested ARARs from PADER and will forward when received.

### VI. EXPECTED CHANGE IN THE SITUATION SHOULD NO ACTION BE TAKEN OR ACTION DELAYED

If no action is taken or action is delayed, the threat of a continued release of CERCLA hazardous substances, pollutants and contaminants and potential fire and explosion hazard increase as drums and containers fully exposed to the elements continue to deteriorate. Additionally, the structural integrity of the bulk underground storage container is questionable, and may be directly responsible for PADER-documented hexavalent chromium contaminated soil, and potential groundwater contamination.

### VII. OUTSTANDING POLICY ISSUES

There are no outstanding policy issues pertaining to the Chem Fab Corporation Drum Site.

### VIII. ENFORCEMENT

The EPA Removal Enforcement Section has been provided with all background information available to pursue any, and all enforcement actions pertaining to the Chem Fab Corporation Drum Site (see attached Confidential Enforcement Memorandum).

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**. Newspaper Articles**

**D. Photo Documentation**





Photo 1 - Drums and glassware found in trailers on-site.



Photo 2 - Haphazard drum storage, as discovered, in rear of computer building



Photo 3 - Chem-Fab drum storage outside warehouse.



Photo 4 - Chem-Fab storage of drums and small containers inside warehouse.

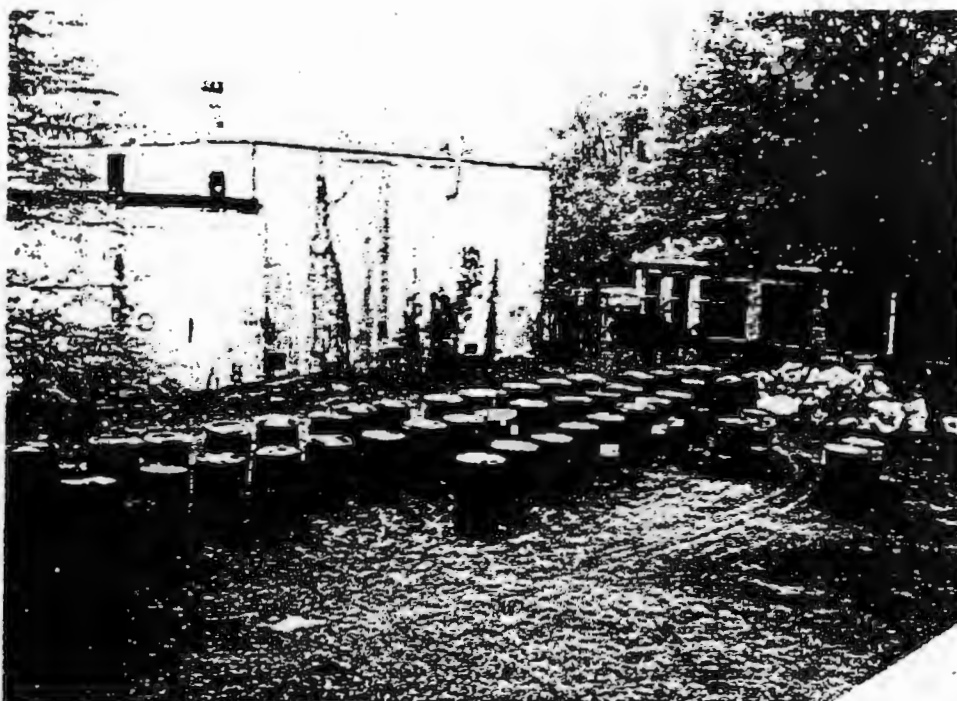


Photo 5 - ERCs drum staging area in yard between warehouse and computer building. Location of underground storage tank is alongside building, and marked with spray paint on wall.



Photo 6 - Close-up of buried underground storage tank.



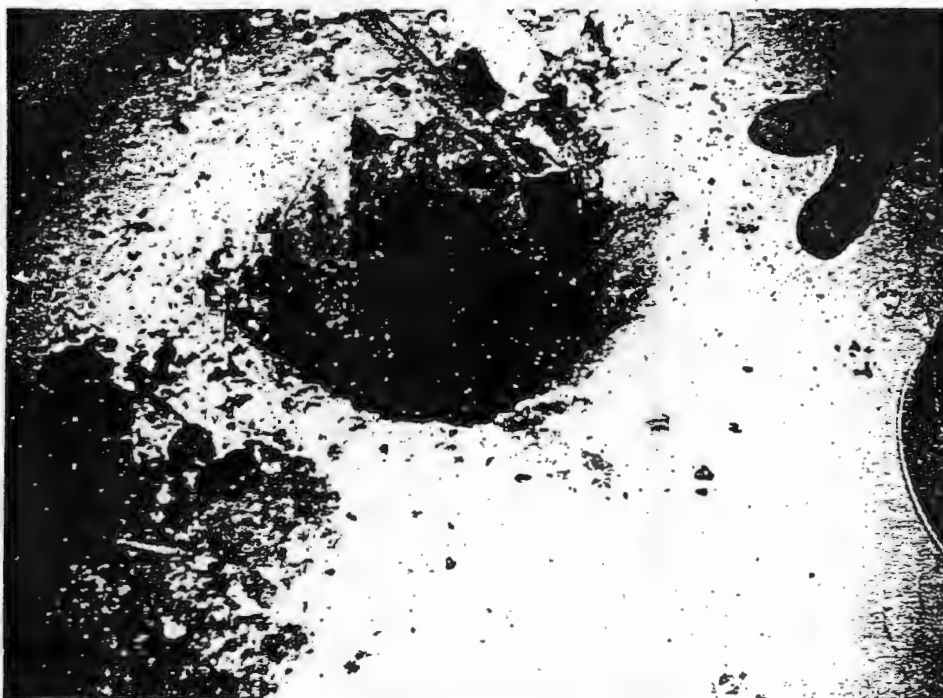


Photo 7 - Suspect drain ports in warehouse. Note stained soil.

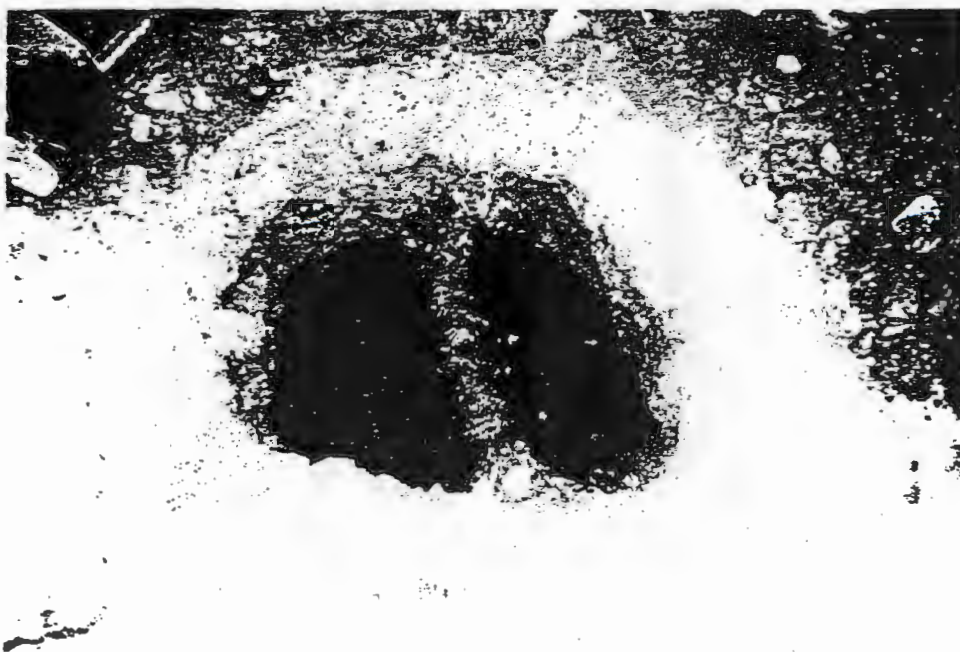


Photo 8 - Suspect drain port in warehouse. Note oil stained water.

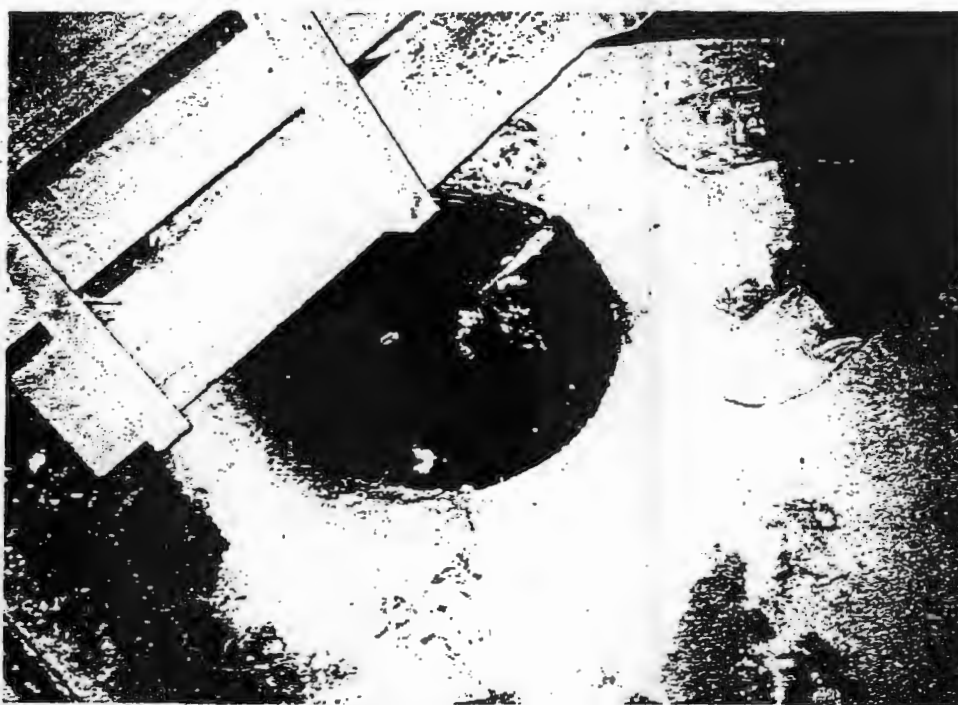


Photo 2 - Suspect sump in warehouse. Note stained water and dead bird.